

From: [ANDERSON Jim M](#)
To: erin.madden@gmail.com
Cc: Eric.Blischke/R10/USEPA/US@EPA
Subject: FW: LWG Response to EPA Comments on Upland Source Table
Date: 08/12/2008 12:19 PM
Attachments: [2008_07_25_Response_to_Comments_on_Source_Table_ARW.PDF](#)
[2008-07-23_Table_5_1-2_\(2\)_ARW.PDF](#)

Erin,
Per your request...

Jim Anderson
Manager, DEQ Portland Harbor Section
ph: 503.229.6825
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-----Original Message-----

From: Valerie Oster [mailto:voster@anchorenv.com]
Sent: Friday, July 25, 2008 1:30 PM
To: humphrey.chip@epa.gov; blischke.eric@epa.gov; ANDERSON Jim M
Cc: Rick Applegate; Patty Dost (Schwabe); wolffg@plu.edu; J Betz;
jpsnyder@stoel.com; Bob Wyatt; valerie; Nick Varnum; Keith Pine;
david.ashton@portofportland.com; Jim.McKenna@portofportland.com
Subject: FW: LWG Response to EPA Comments on Upland Source Table

Chip, Eric, Jim,

Please see below and attached for your review.
Thanks!
valerie

Valerie Thompson Oster
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-----Original Message-----

From: Nick Varnum [mailto:nvarnum@integral-corp.com]
Sent: Fri 7/25/2008 11:09 AM
To: Valerie Oster; Jennifer Woronets
Cc: jpsnyder@stoel.c; Gene Revelas; Sue Trevathan
Subject: LWG Response to EPA Comments on Upland Source Table

Valerie, please forward EPA and the Management Team.

Attached are the LWG's responses to EPA's January 2008 comments on Table 5.1-2 of the Round 2 report and the revised table.

The attached table is color coded to show the original entry (black), EPA's recommendation (red), and the LWG's proposed revision (green). As agreed upon with EPA, a revision to this table is the main data product for the upland sources section for the RI.

Integral will be scheduling meeting with DEQ project managers to resolve differences in table entries. LWG proposes that communications with DEQ that result in changes to the table be assembled in a brief document similar in format to the response to comments attached. This document would be provided as an Appendix to the RI.

The table also includes ECSI sites adjacent to RM 11 to 11-8. These are listed at the bottom of the table (yellow highlight) and include the compiled RM 11-11.6 east bank sites as a group and 22 additional sites, mostly on the west bank. Note that the source of the information for table entries for these sites is limited to information on the DEQ ECSI web sites (including attached reports when available).

Please also note there has been a global change to the entry for overwater releases. H* indicates the facility had a historic overwater pathway and there are current overwater operations, but there are no

documented current overwater impacts. This change was applied to facilities with current overwater operations.

Nick Varnum, R.G.
Managing Scientist

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This communication is made under the framework of the LWG Participation Agreement and in the parties' common interests in meeting LWG member obligations under the Administrative Order on Consent and in anticipation of litigation concerning liability for the Portland Harbor Superfund site. This communication is intended and believed by the parties to be part of an ongoing and joint effort to develop and maintain a common legal strategy and contains strategies, work product and legal advice within the "common interest" extension of the attorney-client privilege and the work product doctrine. This communication may include attorney-client communications. With respect to communications by private LWG members to public members, those communications are with the expectation that they will be kept confidential by the public entities. The information is intended to be for the use of the individual or entity named above. If you are not the intended recipient, please be aware that any disclosure, copying, distribution or use of the contents of this information is prohibited. If you have received this electronic transmission in error, please notify us by electronic mail at nvarnum@integral-corp.com <<mailto:nvarnum@integral-corp.com>> .